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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

AMERICAN WILD HORSE CAMPAIGN,  
*et al.*,  
  
Petitioners,  
  
v.  
  
TRACY STONE-MANNING, *et al.*,  
  
Respondents.

**MOTION TO ADMIT WILLIAM S. EUBANKS II AND MATTHEW R. ARNOLD**  
***PRO HAC VICE***

The undersigned counsel for Petitioners hereby moves for the *pro hac vice* admission of William S. Eubanks II and Matthew R. Arnold for the purpose of representing Petitioners American Wild Horse Campaign, Animal Welfare Institute, Western Watersheds Project, Carol Walker, Kimerlee Curyl, and Chad Hanson in the above-captioned matter. Mr. Eubanks and Mr. Arnold work at Eubanks & Associates, PLLC, which maintains its headquarters and principal place of business at 1629 K Street NW, Suite 300, Washington, DC 20006. Their contact information is as follows: (1) William S. Eubanks II, (970) 703-6060, [bill@eubankslegal.com](mailto:bill@eubankslegal.com); and (2) Matthew R. Arnold, (843) 718-4513, [matt@eubankslegal.com](mailto:matt@eubankslegal.com).

The undersigned is a member in good standing of the Bar of the State of Wyoming and the Bar of this Court. The undersigned hereby represents that she can vouch for the good moral character and veracity of Mr. Eubanks and Mr. Arnold. She further affirms that, although Mr. Eubanks and Mr. Arnold will take the lead in representing Petitioners, she will also be fully prepared to represent the clients at any time, in any capacity.

Attached in support of this motion are the affidavits of Mr. Eubanks and Mr. Arnold.

Respectfully submitted,

/s/ Leah C. Schwartz  
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Date: May 10, 2023

*Counsel for Petitioners*